

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JOHN P. "JACK" FLYNN
LESLIE A. FLYNN,

Plaintiffs,

- against -

CABLE NEWS NETWORK, INC.,

Defendant.

Case: 1:21-cv-02587-AS-SLC

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that Defendant Cable News Network, Inc. will move this Court, before the Honorable Arun Subramanian, United States District Judge, Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on such date and time as the Court sets, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure dismissing Plaintiffs' First Amended Complaint with prejudice, reasonable attorneys' fees and costs pursuant to R.I. Gen. Laws § 9-1-28.1, and for such other and further relief as the Court shall deem just and proper. In support of this motion, Defendant relies upon the accompanying (1) Memorandum of Law in Support of Defendants' Motion for Summary Judgment, (2) Statement of Undisputed Material Facts, and (3) Declaration of Katherine M. Bolger and the exhibits annexed thereto.

PLEASE TAKE FURTHER NOTICE that, pursuant to the order granting the parties' consent letter-motion for extension of time entered by the Honorable Gregory Woods on August 1, 2023 (ECF No. 165), opposing papers, if any, must be served upon the undersigned on or before four weeks from the date that the motion for summary judgment is filed or served; and reply papers,

if any, must be served no later than two weeks after the date of service of the relevant opposition.

Any oral argument will occur on a date and at a time designated by the Court.

Dated: New York, New York
October 27, 2023

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Katherine M. Bolger
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